

**REMARKS****Specification**

The specification has been amended so that the paragraph beginning on Page 10 Line 28 recites "server 18" " and "gateway 26" " as requested.

**Claim Objections**

The term "terminal." in line 16 and line 6 of claims 16 and 17 respectively has been corrected to "terminal,".

The term "intra-sever" on line 1 of Claims 7 and 8 has been corrected to "intra-server",

**Claim Rejections – 35 USC § 112**

Claim 10 has been amended to depend upon Claim 9 which recites the feature of "a control port", providing antecedent basis for the term "the control terminal" in Claim 10.

Claim 13 has been amended to clarify that the "packet-switched network" is a "first packet-switched network". Further references to "the first network" in Claim 13 have been amended to recite "the first packet-switched network" accordingly.

**Claim Rejections – 35 USC § 101**

Claims 11 and 12 have been amended to recite that the control message "when received by an address translator... causes the address translator to...". Applicants therefore submit that Claims 11 and 12 are directed towards statutory subject matter.

Claim 15 has been amended to recite "Software which when executed on suitable hardware in a call server". Applicants therefore submit that Claim 15 is now directed towards statutory subject matter.

Claim 17 has been amended to recite "Software which when executed on suitable hardware in an address translator". Applicants therefore submit that Claim 17 is now directed towards statutory subject matter.

**Claim Rejections – 35 USC § 102****Claim 6**

Claim 6 has been amended to recite that the call server is in a first packet-switched network and includes "a terminal controller arranged to receive a call set-up request from an originating terminal in the first network and provide the originating terminal with an address of an address translator in the first network as its destination address for the call".

Applicants submit that Borella does not disclose the feature of the originating terminal being provided with an address of an address translator in the same network as the destination address for the call.

Rather, Borella discloses that first telephony interface transmits a caller signal comprising first caller data packets having the private caller address as their source addresses and the proxy private callee address as their destination addresses" (Column 10 Lines 37 to 39). The router in the first network on receiving a message from a caller station "performs network address translation on the first caller data packets by translating the private caller address into the public caller address and translating the proxy private callee address into the proxy public callee address" (Column 10 Lines 40 to 44).

Thus, it can be seen that the transmitting station addresses messages that it sends to a proxy private callee address and does not address messages to the router. The proxy private caller address is defined in Borella as serving "to identify caller station 24 on second edge network 16" (Column 9 lines 21 to 22). Additionally, "the proxy private callee address will serve to identify callee station 26 on first edge network (Column 9 lines 38 to 40).

Furthermore, on lines 27 to 29 Borella states that each edge network will "have only one router connecting it with intermediate network 12". Thus, Applicants submit that one skilled in the art would understand that any messages transmitted to a different network through an intermediate network will automatically pass through the router. Therefore, there is no incentive to one skilled in the art to address messages sent by terminals in the edge networks to the routers.

Applicants therefore submit that Claim 6 is not anticipated by Borella. Applicants submit that Claim 8 is not anticipated by Borella at least by virtue of its dependency upon Claim 6.

Claim 9

Claim 9 has been amended to specify that the address translator is in a first network and is communicating with a first terminal in the first network. Claim 9 has also been amended to recite that "when the address translator receives a message addressed to it from the first terminal, the address translator maps its address to an address for the another address translator".

Thus, Applicants submit that, as discussed above, one skilled in the art would only learn to construct a router that translates a proxy private callee/caller address to a proxy public callee/caller address. One skilled in the art would not learn to construct an address translator that on receiving a message addressed to it from a terminal "replaces its address with an address for the another address translator".

Applicants therefore submit that Claim 9 is not anticipated by Borella.

Claim 10 has been amended to be dependent upon Claim 9. Applicants therefore submit that Claim 10 is not anticipated by Borella at least by virtue of its dependency upon Claim 9.

Claims 11 and 12

Claim 11 recites a signal that causes an address translator to generate a mapping between "an originating terminal in the first network and another address translator in a second network". As discussed above the router in Borella would include a mapping between a proxy private callee/caller address and a proxy public callee/caller address and not a mapping between an originating terminal and a second router. Thus, Applicants submit that Claim 11 is not anticipated by Borella.

Claim 12 recites a signal that causes an address translator to generate a mapping between "a destination terminal in the second network and another address translator in a first network". Thus, Applicants submit that Claim 12 is not anticipated by Borella for at least the same reasons as Claim 11.

Claims 14 and 15

Claims 14 and 15 have been amended to clarify that the terminal in the first network is provided with the address of an address translator in the first network. Applicants submit that Read does not disclose the feature of "providing the terminal in the first network with the

address of an address translator in the first network for use as the terminal's address" as recited in Claims 14 and 15.

Rather, Read discloses that the terminals are sent a message that "names the IP address 45.6.7.8/2777 [the IP address of a proxy server present in a shared network] as the port to which terminal A110 should make an H.245 connection" (Paragraph 0101). A similar H.245 connection is made with the terminal B112 (Line 6 paragraph 0105). Read further states in Paragraph 0079 that "in order for H.323 terminals in...[a]...first enterprise to communicate with other H.323 terminals in the second enterprise there must exist a shared network to which a proxy server is connected" (emphasis added).

Thus, the terminals in Read use the public address for proxy server in a shared network as a destination address and the terminals in the first network of the present invention use the address of an address translator in the first network.

Thus, Applicants submit that Claims 14 and 15 are not anticipated by Read.

#### Claims 16 and 17

Claims 16 and 17 have been amended to recite that the address translator is "in the first packet-switched network" and receives "notification from a call server of the address of a terminal in the first packet-switched network which will be sending data". Claims 16 and 17 have also been amended to recite that the translator receives "notification of an address to which data should be sent when received from the terminal in the first packet-switched network".

Applicants submit that this is not disclosed by Read. Rather, in Read a proxy server in a shared network is notified of the addresses to transmit data within a call. As discussed with reference to Claims 14 and 15 the proxy server is not in the first or second network but rather is in a shared network.

Furthermore, the routers disclosed in Read execute conventional network address translation. Read states that as packets transmitted by the terminals "pass through the simple Network Address Translation (NAT) function in the router the source IP address in the IP packet is changed to the public equivalent IP address for the source" (Lines 11 to 14 of Paragraph 0085). Thus, as the routers are carrying out conventional NAT it cannot be said that the routers determine that on receiving data from the terminal they should forward it to a notified address.

Applicants therefore submit that neither Claim 16 nor Claim 17 is disclosed by Read.

**Claim Rejection – 35 USC § 103**

**Claim 13**

Applicants submit that Claim 13 is not rendered obvious by Borella in view of Read. Claim 13 recites the features of providing a "terminal [in a first packet-switched network] with the address of the address translator [in the first packet-switched network] as its destination address for a call" and the address translator generating a mapping between the "address of the terminal in the said first packet-switched network and the address of another network address translator outside the first packet-switched network".

As discussed above neither Borella nor Read disclose the feature of a mapping in an entity in a first packet-switched network where the mapping is between an address of a terminal in a first packet-switched network and the address of another network address translator outside the first packet-switched network. Therefore, Applicants submit that Claim 13 is not rendered obvious by Borella in view of Read.

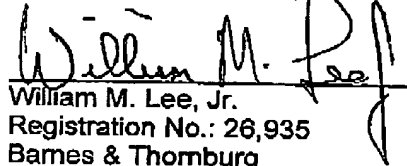
**Claim 7**

For the same reasons as given for Claim 13 above, Applicants submit that Claim 7 is not rendered obvious by Borella in view of Read.

In view of the above, it is submitted that the application is now in condition for allowance, and such action is solicited.

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Respectfully submitted,



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